

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

United States Courts  
Southern District of Texas  
FILED  
*January 04, 2021*

Nathan Ochsner, Clerk of Court

**NACHAIYA KAMA** §  
Plaintiff, §  
vs. §  
**TIRR MEMORIAL HERMANN,** §  
Defendant. § **(JURY TRIAL DEMANDED)**

---

**PLAINTIFF KAMA'S RESPONSE TO DOCUMENT 53**

---

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Comes now, Nachaiya Kama, Plaintiff in the above-captioned cause, files this response, counters the defense counsel arguments/Motion in (Dkt 53) and all therein, and states the following:

- A. The Defendant's counsel(s) on record again failed to focus on the subject matter of recent arguments on their failures to obey and comply with court order(s) as attached in Exhibit: A (Dkt 42), B (Dkt 43), and C (Dkt 49) all signed. Instead, Defendant's counsel(s) repeats matters they have mentioned previously and refiles exhibits to make irrelevant arguments to fault their failures on Plaintiff Kama.
- B. The Defendant's counsel(s) mentions failures, refusals, and not cooperating, etc in (Dkt 53) This Honorable Court is my witness as it is evident in (Dkt 44), (Dkt 45), and (Dkt 47) and other previous filings earlier in the months. Defendant's counsels(s) on record fails and refuses to take responsibility for their actions that they are held accountable for, especially their vexatious patterns of moving dates (3 times) that interfered with court ORDERS for their own suitability and uses manipulative/deceitful excuses for their ulterior motives.
- C. Defendant's counsels mention that Plaintiff Kama is denying their client an opportunity, I object on the grounds that before January 11, 2019, Plaintiff Kama gave too many opportunities to make it right from June 21 2018 at least (3 times) before it became *Kama vs TIRR Memorial Hermann*. Defendant's counsel's client saw this coming as they failed

to address and take action to what Title VII forbids before April 4, 2017. Instead, my fellow Americans were oppressed/fired.

- D. The Defendants counsel(s) again drafts another manipulative proposed order by reverse psychology; faulting Plaintiff Kama on their flagrant disregard of the ORDER of this Honorable Court of which the Defendant's counsels on record failed to abide by, contradicting their arguments/frustrations by drafting another deceptive proposal for Plaintiff Kama to face the music that should face and dance to, pushing for another signature on paper to carry out their agenda after acknowledging (Dkt 52) in (Dkt 53), and threatening my seventh (7th) Amendment to the constitution. What an insult.
- E. Plaintiff Kama PRAYS that the Defendant counsel(s) on the record proves to this Honorable Court where Plaintiff Kama disregarded an ORDER from the Federal Bench or took for granted the signature attached in the Exhibits as if it were on a bouncing castle in a playground.
- F. The Defendant's counsel(s) disregards court order(s) but yet is desperate for a deposition on Plaintiff Kama. I have made my point clear in (Dkt 52).
- G. Defendant's counsels did not act in good faith if not a Motion to Compel would not exist but yet files (Dkt 51) without copying Plaintiff Kama deceiving the court for a signature paper.
- H. On November 29, 2019, Plaintiff Kama filed this suit at the above address and not the Defense counsel's law firm. Court ORDERS (as attached) over personal alterations/manipulating Court ORDERS from a law firm. In other words, we are in court and not littler.
- I. Again, Defendant's counsel is aware that Plaintiff Kama has no legal counsel in this suit.

On these grounds, Plaintiff Kama respectfully moves this Honorable Court to DENY and quash the defendant's counsel's argument/Motions and all therein.

Respectfully Submitted,

Date: December 31, 2020

  
Plaintiff Kama. (Pro Se)